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January 30, 2009

1-HUM-101-78.026
Eureka Marina Center DTIS
SCH# 2006042024

Sidnie Olson, Principal Planner
Community Development Department
City of Eureka
531 K Street
Eureka, CA 95501

Dear Ms. Olson,

We have reviewed the Draft Environmental Impact Report (DEIR) and Appendices, including the Traffic Impact Study (TIS) for the proposed Balloon Track Mixed Use Development, dated November 2008.

The proposed project includes 313,500 square feet of Retail/ Service; 28,000 square feet of Nursery/ Garden; 104,000 square feet of Office; 72,000 square feet of Multi-Family Residential (54 units); 70,000 square feet of Light Industrial; 14,000 square feet of Restaurant; and 12,000 square feet of Museum. The project site includes approximately a quarter mile of frontage on Broadway (SR 101). The project is expected to generate an additional 15,666 daily trips on local roads, including 792 trips in the a.m. peak hour and 1,369 trips in the p.m. peak hour.

Our comments here should not be considered to be exhaustive, but cover the areas of relative importance from a transportation perspective. We have the following comments:

**Project Phasing/ Mitigation (DEIR p. III-14, Section C)**
Traffic impacts from the project are proposed to be mitigated through a combination of measures that would complement each other and provide improved operations on Broadway as a linked system. These measures are listed on page 54 of the TIS: "Mitigation Needed at Project Opening (Assuming Full Development of All Uses)." We concur with this approach in concept, as analysis has shown that the Broadway corridor operates as a complex system.

It is noted in both the TIS and the DEIR text that all 30 measures listed on page 54 of the TIS may not be necessary (required) to be completed at once if the project is constructed in phases. However, a detailed phasing plan has not been developed.

Since the required mitigation measures work in conjunction with each other—improving traffic flow up and down 101 as a coordinated system—they can not be implemented piecemeal. A separate TIS will have to be developed for any Phasing Plan, so that appropriate measures are identified and constructed in association with each planned phase. If the project is to be constructed in phases, we recommend that development of a detailed Phasing Plan and supplemental TIS be required as a condition of approval for the project

**Right of Way/ Geometrics**
As we've noted in previous correspondence, a number of identified measures appear to require more right of way than exists. As design details are confirmed, surveys will be required in order to confirm right of way assumptions and needs. Among the most likely locations where right of way issues may occur are:

The addition of east and westbound left turns lanes on Washington at Broadway appears to require widening and/ or prohibition of parking.

The new signal at Hawthorne and Broadway calls for 58' cross section on Hawthorne. The existing width is about 35' on the east side of Route 101, and about 44' on the west side of Route 101. While the TIS indicates an existing 60' right of way width for Hawthorne, topographic constraints may impact design.

At the Route 101/ Harris Ave. intersection the TIS proposes to shift the southbound lanes "at least 6 feet" to the west, in order to give an adequate turning radius for Surface Transportation Assistance Act (STAA) vehicles. As we've previously noted, this would at least require a design exception for reduced lane and/or shoulder width, and may require a more complex engineered solution in order to avoid impacting the existing right turn lane into the mall.

Future (2025 plus project) scenario calls for 3 southbound lanes from Vigo St. to the mall. In some areas there does not appear to be enough existing width to do this.

**Encroachment Permit Process**
All improvements within Caltrans right of way will require an encroachment permit. It appears that the total cost for mitigation within Caltrans right of way will exceed three million dollars, and would therefore require a separate Project Study Report (see Chapter 9, Article 8 of the Project Development Procedures Manual: http://www.dot.ca.gov/hq/oppd/pdpm/other/PDPM-Chapters.pdf ).

We strongly recommend that the developer submit preliminary engineering design plans for all proposed street and signal improvements/modifications to both Caltrans and the City as early as

possible, so that any potential design issues can be addressed in a timely manner. Potential issues may include Design Exceptions and Traffic Handling/ Stage Construction Plans, which require Caltrans approval.

**Safety Considerations**
Overall, there are many improvements with potential safety benefits included as part of the proposed project mitigation. We know that reducing the congestion on Broadway will also improve safety and reduce collisions.

However, we do not agree with the following conclusions stated in the Accident Analysis (Appendix P, Page 16):

- "...the expected reduction of accidents overall is 15 percent."
- "It is estimated that there will be 16.6 fewer accidents per year at the study intersections..."

These conclusions have not been substantiated within the document. It is stated that the Highway Safety Improvement Program (HSIP) Guidelines were used to develop the collision reductions. However, the HSIP Guidelines are for locations with a singular improvement. The project and mitigation measures represent a system of modifications, and cannot be reduced to a singular accident collision reduction percent. In addition, it is not appropriate to make the claim that a specific number of accidents will be reduced. In fact, with the introduction of new signals, some types of collisions will likely increase while the severity will be decreased. Given the complexity of the project and mitigation measures this conclusion is not appropriate without an equally complex model of the system.

Recently a Pedestrian Safety Audit was completed by Caltrans, the City of Eureka, and FHWA. One of the safety issues that were identified was the long distance between crossings on Broadway. It was recommended that Harris St., Hawthorne St., and Clark St. be signalized to allow safer crossings for pedestrians. It was discovered during this process that Clark St. has a particularly high number of pedestrian crossings. Given the future increases expected in pedestrian activity, and the recent findings during the Pedestrian Safety Audit, signalization at Clark St. should be considered.

**Other Comments (TIS)**
Page 3, Paragraph 3 states that bicycles desiring to travel east on Seventh Street will need to cross Broadway at Sixth Street, then travel south on the sidewalk to the bike lane on Seventh Street. This recommendation, although likely to occur, is unacceptable, as bicycles would be traveling in the wrong direction and on the sidewalk.

Our previous comments (October 5, 2007) noted that a dedicated Right turn lane would be required on Eastbound Hawthorn due to the predicted increases in right turn volumes, (from 14 to 259 p.m. peak hour). This lane is not noted in Mitigation Measure O-1c, but is now noted in the TIS text on page 54, #16. This should also be reflected in Figure 13 (and Page IV.O-38 of the DEIR).

Page 54, Mitigation 8: Raised Median on Broadway at 7th Street.
Some consideration should be given to evaluating the raised median as a pedestrian refuge. This may include extending the raised median to Clark Street and further south to accommodate the frequent mid-block pedestrian crossings.

Appendices G, H, and K are extremely difficult to read due to their size and quality, as this is the final documentation supporting the TIS, consideration should be given to making them readable.

Appendix M concerns the use of gates. Gates are no longer mentioned in the TIS or the DEIR. There is no need to include this Appendix.

Appendix H does not include the Greater Eureka Travel Model (GEATM) use and calibration documentation referred to in the TIS text. As the use of the GEATM for this project is repeatedly referenced both in the TIS and the DEIR, consideration should be given to including the documentation of its use.

Page 54, Mitigation #9 (DEIR Mitigation Measure O-1h). This mitigation also effectively prohibits left turns onto Commercial Street from southbound Broadway. No mention of this is included in these documents. The Commercial Street intersection has been omitted from this study; although, it is directly across from the project site.

The TIS as presented includes minimal intersection analysis for the year 2025. A few 2025 intersection analyses are provided in the appendices, all of the impacted intersections should be included. The Cumulative 2025 + Project volumes as shown appear flawed. For example: Figure 10, Baseline 2010 + Project, Intersection #1 (Broadway/4th Street) shows peak hour volumes of 86 and 96 vehicles per hour (vph) in the AM and PM period respectively. As projected in Figure 15, Cumulative 2025 + Project, the same peak hours show a reduced AM volume of 71 vph and the same PM volume. Many other intersections do not add the expected diverted traffic to certain movements including Wabash Avenue and Broadway, and Hawthorn and Broadway.

**Other Comments (DEIR)**
Table II-1

We concur with the need for Mitigation Measures O-A through O-K to be required as part of the entitlements for the entire project, as analyzed in the TIS. In addition, we concur with the need for the other improvements described on page IV.O-26, "Proposed Project Access and Off-site Improvements." All of these measures are listed on page 54 of the TIS: "Mitigation Needed at Project Opening (Assuming Full Development of All Uses)."

The description of the proposed 6th Street offset intersection on page IV.O-26 states that relocation of the southern Crivelo's driveway "is desirable. . . ." We concur with the finding in the TIS (page 54, #7) that the driveway *must* be relocated.

We recommend that the explanation for why the raised median is needed (also on page IV.O-26) be replaced with the verbiage found in #8, page 54 of the TIS.

Page IV.O-1 to O-4. There is no description regarding Hawthorn Street. We recommend that a description of this street be included since a signal is proposed to be installed at Hawthorn Street and Broadway and it is proposed to be a major exit route for traffic exiting the project area. The pavement on Hawthorne Street west of Broadway is dilapidated and should be improved. If not improved, traffic will not be inclined to use this route to exit the project.

Page IV.O-38. (Figure 13 in the TIS): In the "With Project" plan, eastbound and westbound Washington Street should have left turn lanes (consistent with IV.O-37).

We look forward to continued collaboration with City staff and consultants on this challenging project.

Sincerely,

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